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Attorneys for Defendant
Roderick C. Reed

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODRICK C. REED,

Defendant.

Case No. EDCR 03-00084-VAP-1

DECLARATION OF KATHLEEN
CAULFIELD, EXHIBITS

I, Kathleen Caulfield, declare:

1. I am the court appointed paralegal who is assisting the attorney, Ian Wallach, with the collection of documents and other tasks in the above entitled action.
2. I have spoken by telephone on several occasions with Mr. Reed over the last six weeks, including a 48 minute phone call on May 8th and another 27 minute call on May 10, 2021. I have also communicated with him via the corrlinks email system and have received documents, including

DECLARATION OF KATHLEEN CAULFIELD, EXHIBITS - 1

1 copies of memoranda from the warden to the inmates at Atwater, from
2 him through the U.S. Mail. He has informed me of the following facts:

- 3 a. Visitation at Atwater was suspended at the beginning of the pandemic
4 in approximately February 2020.
- 5 b. On March 5, 2020, the inmates were informed that visits would begin
6 again with new restrictions, including that the visits would be only
7 one hour. A true and correct of a Memorandum to inmates from the
8 Office of the Captain, USP Atwater, dated March 5, 2020 is attached
9 hereto as "EXHIBIT A".
- 10 c. Then, on April 1, 2020, the Director of the BOP placed all inmates on
11 lockdown for 14 days. A true and correct of a Memorandum to
12 inmates from the Director of the BOP, dated April 8, 2020 is attached
13 hereto as "EXHIBIT B".
- 14 d. Box lunch meals consisting of sandwiches were provided to the
15 inmates in their cells.
- 16 e. Commissary was suspended as well as showers and access to the
17 phones.
- 18 f. After the first 14 days, showers were allowed every 4 days. After one
19 month, essential workers were moved to a special unit and the inmates
20 started receiving hot meals.
- 21 g. Basically all activities were suspended. Plans were to allow the
22 resumption of recreational activities (basketball, volleyball, handball
23 and soccer) starting on May 10, 2021.
- 24 h. Mr. Reed explained that some of the restrictions were relaxed in
25 November, 2020, albeit for short periods of time. Each tier was
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1 allowed approximately 45 minutes a day to shower, use the phones
2 and send emails.

3 i. Unfortunately, soon thereafter most of the inmates began to
4 experience symptoms of Covid-19, including Mr. Reed. He explained
5 that all he could do was stay in his cell, propped up on his bed, as it
6 was very difficult to breathe. He states that he lost his sense of smell.
7 He also stated that he felt like he was smelling cigarette smoke—like
8 someone was blowing cigarette smoke in his face.

9 j. On December 18, 2020 a memorandum was sent to the inmates
10 advising that a number of inmates were displaying symptoms of
11 Covid-19, and as a result all units were placed on quarantine again. A
12 true and correct of a Memorandum to inmates from the Office of the
13 Captain, USP Atwater, dated December 18, 2020 is attached hereto as
14 “EXHIBIT C”.
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16 k. Mr. Reed tested positive for Covid-19 on December 21, 2020. A true
17 and correct of a lab report from Quest Diagnostics, dated December
18 27, 2020 is attached hereto as “EXHIBIT D”.

19 3. The medical reports received from USP Atwater indicate that as of
20 January, 2021, Mr. Reed no longer presented with symptoms of Covid.
21 Mr. Reed states that his sense of smell has not returned and he still
22 “smells cigarette smoke” all the time. He also states that he feels winded
23 after walking short distances and as a result he does not expect to be able
24 to participate in recreational activities.

25 a. Mr. Reed states that he has been prescribed nasal spray which he uses
26 in the morning and in the evening every day, due to a chronic problem
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1 that affects his breathing. The medical reports state that he suffers
2 from chronic rhinitis. Mr. Reed also states that he was diagnosed with
3 high blood pressure in August 2020 and prescribed medication which
4 he is taking. A true and correct of selected BOP medical reports are
5 attached hereto as "EXHIBIT E".

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7 4. Mr. Reed also stated that he had requested to be vaccinated on six
8 occasions but was told that Atwater had limited doses available. On
9 Monday, May 17, 2021, he received his first dose of the Pfizer vaccine.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed on May 20, 2021, at Los Angeles, California.

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14 _____/s/_____
15 Kathleen Caulfield
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